

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION  
IN ADMIRALTY

CV 4 13 - 032

GULFSTREAM VENTURES, LLC, )  
)  
Plaintiff, )  
)  
v. )  
)  
The Wrecked and Abandoned Vessel, )  
S/S MERIDA, her tackle, engines, cargo, )  
etc., *in rem*, )  
)  
Defendant. )

CASE NO.

FILED  
U.S. DISTRICT COURT  
SAVANNAH, GA.  
2013 FEB 7 AM 11:40  
CLERK  
SO. DIST. OF GA.

**MOTION FOR WARRANT OF ARREST**

Now comes Gulfstream Ventures, LLC ("Gulfstream"), Plaintiff in the above-styled case, and pursuant to Rules C and D of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, respectfully shows:

1. Gulfstream has filed its Verified Complaint in Admiralty against the Wrecked and Abandoned Vessel, S/S MERIDA (the "Vessel"), in rem, praying for the Court to enforce a maritime lien against the Vessel and her cargo and/or to award Gulfstream exclusive rights to the Vessel pursuant to the grounds set forth in the verified complaint.

2. Defendant Vessel and her cargo are presently located approximately 60 miles off of the coast of Virginia in 210 feet of water, but one or more artifacts from the Vessel is or during the pendency of this action will be within the jurisdiction of this Honorable Court.

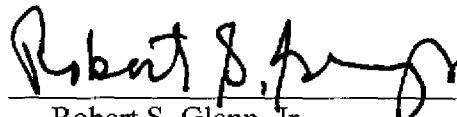
3. Gulfstream asserts that unless a warrant for arrest issues against the Vessel and her cargo, Gulfstream will lose security for its lien. Gulfstream verily believes that under the maritime law of the United States, it has good cause to arrest the Vessel and her cargo.

4. Based on accounts of the sinking of the S/S MERIDA, Gulfstream believes that her hull and cargo may be scattered over a wide range. In addition, Gulfstream believes that other parties may attempt to remove artifacts and/or cargo from the site. Gulfstream requests that the court grant it custody of the Vessel, her cargo and artifacts and exclusive rights to conduct operations to recover same in an area delineated as a three mile radius from the following center point coordinates: 37 degrees 28.592 minutes North Latitude and 79 degrees 40.714 minutes West Longitude.

For the foregoing reasons, Gulfstream respectfully moves the Court for issuance of a Warrant for Arrest of the Vessel and her cargo presently located at sea, but within the jurisdiction of this district by virtue of the artifact which is present here, and which will be brought here during the pendency of this action, in terms of law.

This 7<sup>th</sup> day of February, 2013.

ELLIS, PAINTER, RATTERREE & ADAMS LLP

By:   
Robert S. Glenn, Jr.  
Georgia Bar No. 297306

Post Office Box 9946  
Savannah, GA 31412  
(912) 233-9700  
Email: bglenn@epa-law.com